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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CHASOM BROWN, et al.,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Mitchell M. Breit (*pro hac vice* to be sought)
Jason 'Jay' Barnes (*pro hac vice* to be sought)
An Truong (*pro hac vice* to be sought)
Eric Johnson (*pro hac vice* to be sought)
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Case No. 5:20-cv-03664-LHK

**DECLARATION OF LESLEY E. WEAVER
IN SUPPORT OF ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
CASES SHOULD BE RELATED**

1 1. I am an attorney licensed in the State of California and admitted to the United
2 States District Court for the Northern District of California. I am the Partner-in-Charge of the
3 Oakland office of Bleichmar Fonti & Auld LLP (“BFA”), and counsel for Plaintiffs in *Hewitt*,
4 *et al.*, v. *Google LLC*, No. 5:21-cv-02155 (N.D. Cal. Mar. 26, 2021) (“*Hewitt*”). I am a
5 member in good standing of the bar of the State of California and of this Court.

6 2. This declaration is made in support of Plaintiffs’ Administrative Motion to
7 Consider Whether Cases Should be Related.

8 3. On June 2, 2020, plaintiffs commenced *Brown, et al.*, v. *Google LLC*, No. 5:20-
9 cv-03664-LHK (N.D. Cal. June 2, 2020) (“*Brown*”). A true and correct copy of the First
10 Amended Complaint filed in *Brown* on September 21, 2020, is attached hereto as **Exhibit 1**.

11 4. On July 27, 2020, plaintiffs commenced *Calhoun, et al.*, v. *Google LLC*, No.
12 5:20-cv-05146-LHK (N.D. Cal. July 27, 2020) (“*Calhoun*”). A true and correct copy of the
13 complaint in *Calhoun* is attached hereto as **Exhibit 2**.

14 5. *Hewitt* was filed on March 26, 2021, and brings claims on behalf of all Google
15 account holders in the United States whose personal information was sold or otherwise
16 disclosed by Google without their authorization through Google’s real-time bidding system. A
17 true and correct copy of the complaint filed by plaintiffs in *Hewitt* is attached hereto as
18 **Exhibit 3**.

19 6. I declare under penalty of perjury under the laws of the United States and the
20 State of California that the foregoing is true and correct and to the best of my knowledge. This
21 declaration was executed in Oakland, California.

22 DATED: April 1, 2021

By: /s/ Lesley E. Weaver

Lesley E. Weaver